## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

STEFANIE D. HUNTER, NATHAN A. LIEDL, ESTATE OF JAXON HUNTER,

Plaintiffs,

CASE NO. 20-CV-61

v.

CHIPPEWA COUNTY DEPARTMENT OF HUMAN SERVICES, TIM EASKER, SERENA SCHULTZ, and MATTHEW C. ANDERSON

Defendants.

## CHIPPEWA COUNTY DEPARTMENT OF HUMAN SERVICES, TIM EASKER, SERENA SCHULTZ, AND MATTHEW C. ANDERSON'S NOTICE OF MOTION AND MOTION

To: Jay E. Heit

Herrick & Hart, S.C. 116 West Grand Avenue P.O. Box 167 Eau Claire, WI 54702-0167

PLEASE TAKE NOTICE that Chippewa County Department of Human Services, Tim Easker, Serena Schultz, and Matthew C. Anderson, by their attorneys, MUNICIPAL LAW & LITIGATION GROUP, S.C., hereby move the Court, pursuant to Fed. R. Civ. P. 56, for an Order granting their Motion for Summary Judgment and dismissing the Plaintiffs' Complaint on its merits and with prejudice.

This Motion is based upon the pleadings and proceedings herein, the attached Brief in Support, and the Affidavits of Samantha Schmid, Tim Easker, Matthew Anderson, and Ashley Brott. Through this motion, the Defendants also seek their costs and fees.

## Dated this 9th day of April, 2021.

## MUNICIPAL LAW & LITIGATION GROUP, S.C.

Attorneys for Defendants, Chippewa County Department of Human Services, Tim Easker, Serena Schultz and Matthew C. Anderson

By: /s/ Samantha R. Schmid

REMZY D. BITAR State Bar No: 1038340 SAMANTHA R. SCHMID State Bar No. 1096315

730 N. Grand Avenue Waukesha, WI 53186 O: (262) 548-1340 F: (262) 548-9211

E: <u>rbitar@ammr.net</u> <u>sschmid@ammr.net</u>